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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC'S MOTION
TO STRIKE PLAINTIFFS' WITNESS AND
EXHIBIT LISTS**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
6 competently testify to the facts contained herein.

7 2. On December 5, the Court set a 65-hour limit on the trial in this case, which allots Plaintiff
8 39 hours for her case.

9 3. On December 8, Plaintiff served a witness list with 53 witnesses, not including a category
10 for custodians of records and another for sponsoring witnesses, which is attached as Exhibit A.

11 4. On December 10, Plaintiff served an exhibit list with 4,824 exhibits, which is attached as
12 Exhibit B.

13 5. On December 12, I wrote to Plaintiff in relevant part, as follows: “You have served a 55-
14 person witness list, and a 4,824-exhibit list, neither of which is commensurate with your 39-hour case.
15 This voluminous disclosure is not a good faith effort to provide the exhibits and witnesses that you may
16 reasonably call or use at trial. We ask that no later than Tuesday, December 16 by noon PT, you provide
17 a narrowed exhibit and witness list, consistent with direction from the Court last week to provide exhibit
18 and witness lists in good faith. Please let us know if you agree. Absent agreement, we intend to file an
19 administrative motion tomorrow seeking a court order directing you to narrow both lists such that they are
20 good faith representations of exhibits and witnesses that you are likely call or use at trial.”

21 6. On December 13, the parties met and conferred. Plaintiff’s counsel represented that they
22 were working on narrowing the exhibit list and that by December 16, they may be able to produce a list
23 of 3000 or 4000 exhibits. I represented that in Defendants’ view, a good faith exhibit list at this point
24 would have some number of exhibits substantially less than 3,000 exhibits.

25 I declare under penalty of perjury under the laws of the United States and the State of California
26 that the foregoing is true and correct.

27 Executed on December 12, 2025, in San Francisco, California.

28 /s/ Laura Vartain Horn

Laura Vartain Horn